Section 1: General Facility/Organization Information						
Facility Name:						
Fort A.P. Hill, U.S. Army						
Street Address:						
19952 North Range Road, Fort A.P. Hill, VA 22427-3123						
Mailing Address:						
ATTN: Directorate of Public Works						
Contact Name:	Standard Industrial Classification					
Sergio Sergi	(SIC) Code: 9711					
Phone:	Environmental Permit Numbers (list <u>all</u> ,					
(804) 633-8255	including permits from agencies other than DEQ):					
Fax:	VA2210020416, VA032034, VAR530128,					
(804) 633-8443	VPA00008, 332, 40306, 22427\$RMYF18902					
Email:						
sergio.a.sergi@us.army.mil						
Previous Facility Names	Water Source (e.g., public water supply,					
(within past 5 years): N/A	groundwater, etc.): Groundwater					
	o contant and					
Section 2: Type of Participation This application is for: Fort A.P. Hill, U.S. Army						
Environmental Enterprise (E2) [see Section 3]						
_X Exemplary Environmental Enterprise (E3) [see Section 4]						
Extraordinary Environmental Enterprise (E4) [please contact Sharon Baxter at 804-698-4344 for more information on applying for E4]						
Name: Sergio Sergi	Title: Environmental Specialist					
Signature Seigns.	Date 4-18-06					
Certification Statement: By submitting this application the undersigned acknowledges that participation in this program is entirely voluntary. The undersigned accepts and hereby waives any right to appeal any decision made by DEQ with respect to this application regarding participation in or termination from this program.						
Name of Certifying Official:	Title:					
Benjamin H. McBride	Director, Public Works					
Signature: Penamin H. Misside Date: 4-18-2006						

Section 4: E3 Application

The development and implementation of effective environmental management systems (EMS) is the primary goal of VEEP. DEQ does not prescribe the model or type of EMS or the structure of a facility's environmental program. However, DEQ is responsible for verifying that each facility accepted into VEEP meets the program criteria. Therefore, each E3 applicant is required to address several key points related to its EMS. Please provide documentation that shows that the following components are in place at your facility:

Policy Statement. Attach the facility's Policy Statement outlining its commitment to the environment. When reviewing each application, DEQ staff will look for a environmental policy statement that:

- Addresses elements that are supported by EMS activities outlining the facility's commitment to the environment
- Includes/stresses compliance, pollution prevention, training, communication & continuous improvement

Fort A.P. Hill's Garrison Commander has defined and documented the Fort A.P. Hill Environmental Policy as follows:

Signed by the Garrison Commander 9 September 2004

The mission of the United States Army Garrison, Fort A.P. Hill, is to operate a regional center providing realistic joint and combined arms training support focused on developing America's Defense Forces to win on the 21st Century battlespace. The Garrison will perform this mission in consonance with our stewardship responsibility to preserve and protect the environment. In accomplishing our mission, we commit to:

- a. Integrate sound environmental practices into all our operations and business decisions.
- b. Continually assess our activities, products and services to determine their effect on the environment. Identify the significant environmental impacts and ensure that they are considered when establishing our objectives and targets in our environmental programs.
- c. Ensure implementation of pollution prevention measures and waste minimization programs.
- d. Establish quantifiable goals for environmental performance.
- e. Conduct regular environmental management reviews to continually assess our progress toward our environmental goals.
- f. Educate our employees about their responsibilities and recognize them for outstanding participation.
- g. Sustain our partnership with local, state and federal regulatory agencies to continue compliance with existing and new regulations, legislation, and other requirements.
- h. Ensure the community's awareness of our environmental policy through press releases, public meetings, and the world-wide-web.
- i. Enhance mission accomplishment by focusing on readiness requirements as well as compliance.

The Environmental Policy has been communicated to all Garrison Directorates. The policy is the foundation for the establishing and operating the EMS. It is periodically reviewed by the EMS Cross Functional Team (CFT); and Management Review Committee, hereafter referred to as the Environmental Quality Control Committee (EQCC) to ensure that it remains appropriate to the nature and scale of Fort A.P. Hill's activities, products and services.

The policy is available to the public through the Fort A.P. Hill Public Affairs Office (PAO). Contractors currently performing projects or providing services to Fort A.P. Hill will be provided a copy of the Environmental Policy by the Directorate of Contracting (DOC) via mail. New contractors are notified of and provided a copy during the pre-construction meeting.

In addition to and complementing the Environmental Policy, Fort A.P. Hill Regulation 200-1 contains specific policy statements for regulatory programs to conserve, protect, and enhance the environment at Fort A.P. Hill.

Identification of Environmental Impacts. Describe the facility's process for identifying and evaluating its environmental impacts. At a minimum, include a list of the facility's most significant environmental impacts. When reviewing each application, DEQ staff will look for:

- Comprehensive list of impacts/aspects
- Method for determining significant impacts/aspects (e.g., a matrix)
- Impact/aspect review process outlined
- Scheduled review and reevaluation of impacts/aspects

Since the DPW-ED is responsible for day-to-day management of the Fort A.P. Hill environmental program, a thorough understanding of the environmental aspects and impacts arising from Fort A.P. Hill activities, products and services is a prerequisite for successful environmental management.

Established procedures in Fort A.P. Hill Regulation 200-1 require that all major actions such as construction or demolition, field training exercises, and other actions that could have significant environmental impact be assessed through the National Environmental Policy Act (NEPA) process.

On a periodic basis, Fort A.P. Hill reviews its recurring processes, activities, and services; their associated environmental aspects, and identifies those environmental aspects over which it can exercise control. Once identified, the aspects are further analyzed for the significance of their impact on the environment and/or the health and safety of Fort A.P. Hill team members. Under the procedures, the EMS CFT updates the list of recurring activities and services. The updated list is reviewed by the CFT and prioritized by significance. The significant environmental aspects provide input for setting Fort A.P. Hill environmental objectives and targets.

Setting Objectives and Targets. Please include a list of the facility's goals (objectives) for reducing environmental impacts. Ideally, objectives will include numerical goals with projects designed to achieve these goals. The objectives should include targets or a schedule for completing tasks and/or achieving the stated objectives. When reviewing each application, DEQ staff will look for:

- Goals (or objectives) which address your significant impacts/aspects
- Tasks or projects planned for addressing each goal/objective with a targeted schedule for implementation

Fort A.P. Hill focuses its vision by setting specific, measurable environmental goals. These goals are relevant to the interests of Fort A.P. Hill and its stakeholders as well as other interested parties.

In the establishment, documentation, and maintenance of environmental objectives, Fort A.P. Hill considers its mission, its significant environmental aspects, legal and other requirements, its Environmental Policy, Fort A.P. Hill Environmental Regulation 200-1, the views of stakeholders and interested parties.

Proposed environmental objectives and targets are developed by the CFT, the Installation Sustainability Workgroups, and Environmental Program Managers. The proposed objectives and targets are presented for review and approval by the CFT and/or the EQCC or other EMS meetings. Progress in achieving objectives and targets is reviewed on a periodic basis at EQCC meetings or other EMS meetings.

Objectives and targets are revised if needed when regulatory program requirements or other influencing factors change. Changes to objectives and targets may be recommended by members of the CFT, or Environmental Program Managers during an EQCC or other EMS meetings.

Pollution Prevention. In a typical EMS structure, objectives and targets may only address the impacts identified as the most "significant." For the pollution prevention section, please feel free to list any other environmental projects that are ongoing or planned. If possible, please include quantified reductions realized or expected, and any cost savings. When reviewing each application, DEQ staff will look for:

- A dedicated P2 section listing projects and accomplishments
- Reduction numbers and cost savings
- P2 activities outside of significant impacts/aspects

The Installation has a long history of being proactive in protection of the environment and environmental awareness. Activities on the Installation are constantly encouraged to provide Pollution Prevention (P2) ideas, conserve resources and identify and eliminate pollution sources. FAPH initiated an interactive environmental awareness/training program for all military units training on the Installation. All military units are invited, annually, to attend a pre-camp conference where they receive environmental regulations, POC information and general guidance. Prior to their arrival at FAPH all units are required to coordinate with the environmental staff and provide a detailed description of their mission while on the Installation. The implementation of this successful training and awareness program has provided many opportunities for pollution prevention, especially with Petroleum and Water Purification exercises, through the elimination of unnecessary waste streams, the reduction of waste generation and increased recycling.

An incentive award program is also in place to reward employees or military training units that go above and beyond their duties in protecting the environment. To date, a total of 39 individual incentive awards have been presented to a multitude of employees and soldiers training on FAPH.

FAPH is a member of many local, state and regional pollution prevention organizations or committees including the following:

- York and Rappahannock River Tributary committees to reduce pollution in the Chesapeake Bay
- Virginia Environmental Enterprise designation and membership
- Businesses for the Bay member
- Member of the Caroline County Planning and Technical Review committee
- Member of the Caroline County EMS committee and LEPC teams

The Installation hosted approximately 250 - 500 local students in celebration of Earth Day 2003 and 2004. Over 20 local, state and federal agencies offered educational displays and presentations.

Implemented an Installation wide Hazardous Materials Management Program (HMMP). This program includes all (100%) activities, tenants and contractors working or visiting FAPH. Through the use of the Hazardous Substance Management System (HSMS) database, all hazardous materials (HM) procured, stored or used on the Installation are tracked from cradle to grave. FAPH identified long ago the potential benefits of HM visibility and also started periodic (monthly) inspections of all shops, activities and tenants. The results of the inspections are shared with the Command staff and every opportunity is taken to reduce pollution and to provide on-the-spot training or awareness during the inspection or soon after.

The business practices and centralized control implemented under HMMP have greatly improved HM management practices by controlling the procurement, receipt and storage of HM. HM inventory has been decreased by 60% and HW generation by 76% when compared to what they were prior to HMMP.

HMMP has also improved personnel safety by closely tracking and continuously updating the Material Safety Data Sheets (MSDS) available to all users. The availability of current MSDS to all employees is a top priority both for personnel protection and for reliable EPCRA reporting. Finally HMMP also includes a fully functional HM re-use program that allows for the return of unused or partially used

HM containers for free reissue to other activities. The HM re-use program has been received positively, reduced HM procurement and has also reduced HW generation and disposal costs.

The FAPH recycling program has continued to expand even though FAPH 's remote location is not very conducive to the development of an economically efficient program. The goal of this program is to reduce solid waste generation, increase the recycling rate and keep operational costs as low as possible. FAPH has been able to increase its recycling diversion rate from 5% in 1999 to over 33% in 2005 and will continue to strive upward until we reach our goal of 40%.

Updated the FAPH Pollution Prevention plan in November of 2003, including completing an Installation wide Pollution Prevention Opportunity Assessment (PPOA). Part of PPOA study included an analysis of the HSMS database inventory, which identified products that could potentially be a problem to FAPH, either because of the ingredients, and associated hazards they present or the cost of disposal. The study identified and proposed less hazardous alternatives for products containing carcinogens, ozone depleting substances, extremely hazardous substances and other toxic chemicals that may be potential targets of future pollution prevention efforts.

Many of the proposed pollution prevention initiatives included in past and current plans include equipment purchases. Recent equipment purchases include:

- Cardboard baler and collection containers
- Low VOC / non hazardous Inland Technology weapons/parts cleaners
- Mobile fuel and lube truck for spill-proof field topping of automotive fluids
- Mobile bulk petroleum containment systems for field POL military exercises
- Brass crusher/deformer for spent ammunition casings prior to recycling
- Freon recovery and recycling equipment
- Aerosol/pressurized can puncture machine

Other recently implemented programs outlined in our plan include:

A comprehensive automotive filter-recycling program has been implemented and all filters are crushed and sent off-site for complete recycling. Kitchen grease from all dining facilities is also collected and recycled through Valley Protein. All petroleum spills (no matter what size) are cleaned up promptly and the contaminated soil is collected and sent to Purgo Inc for thermal remediation and recycling. The thermally treated soil is certified clean upon treatment and has been reused as clean fill on FAPH, closing the recycling loop on this waste stream.

Legal Requirements. Each facility should have a mechanism for tracking changes in environmental compliance requirements. Provide a description of this function.

Fort A.P. Hill's commitment to comply with all applicable federal, state and local environmental legislation and regulations is contained in the command Environmental Policy and in Fort A.P. Hill Regulation 200-1. In addition, Fort A.P. Hill complies with requirements of the Department of Defense and Army Regulations. The Directorate of Public Works (DPW), as the directorate that manages the Fort A.P. Hill environmental program, is responsible for monitoring all applicable environmental legislation and regulations. Within the DPW, the Environmental Division (ED) performs this function. ED Program Managers are responsible for review of all applicable environmental legislation and regulations related to their specific program areas and informing affected Fort A.P. Hill parties and the EMS Management Representative. The program managers monitor federal, state and local regulatory agency websites; receive and review regulatory agency information bulletins, review information sources such as the Bureau of National Affairs, Inc. (BNA), the Federal Register, the Department of Defense, and Department of the Army sources. They also maintain coordination with their counterparts at the Installation Management Agency (IMA) Northeast Regional Organization (NERO) for changes in federal, Department of Defense and Army environmental requirements.

Major changes in environmental regulatory requirements are addressed at EQCC meetings. The changes may result in revision of existing Fort A.P. Hill regulations or documentation and EMS documentation.

Roles, Responsibilities and Authorities. Each facility should have a system for defining, documenting and maintaining roles, responsibilities and authorities for its environmental management system. When reviewing each application, DEQ staff will look for:

- Assignments for projects, tasks or reporting responsibilities
- Upper management involvement or review

To facilitate effective environmental management, Roles and Responsibilities related to the EMS are assigned. Authority is granted, commensurate with each employee's responsibilities. A general description of the organizational structure and environmental roles and responsibilities is provided in this section.

The Garrison Commander defines the Fort A.P. Hill Environmental Policy, and ensures the provision of resources (financial resources, technology, specialized skills, etc.) for the operation of the EMS. The Garrison Commander conducts periodic management reviews of the EMS to ensure its effectiveness and appropriateness to the Fort A.P. Hill mission and processes.

The Deputy to the Garrison Commander assists the Garrison Commander in carrying out Top Management's responsibilities. The Deputy acts for the Garrison Commander in the Garrison Commander's absence.

The Chief, Environmental Division (ED) is responsible for the Environmental Program Management of the Installation. The Chief, ED is responsible for maintaining the Fort A.P. Hill Integrated Discharges Prevention and Contingency Plan (IDCP) and supervises the following individuals who have EMS-related responsibilities:

- ED Program Managers who manage specific Fort A.P. Hill environmental programs and/or plans for media protection and resource conservation including air, groundwater, surface water, soil, cultural resources, pollution prevention, etc.
- A Compliance Inspection Team that schedules and conducts periodic environmental compliance inspections of Fort A.P. Hill's organizations.

The Garrison Commander delegates authority for executing the EMS process to the EMS Management Representative (EMSMR). The EMSMR reports to Top Management. The EMSMR has overall responsibility to manage the day-to-day operation of the EMS. Irrespective of other responsibilities, the EMSMR's responsibilities include the following:

- Ensuring the EMS is established, implemented, and maintained in accordance with the ISO-14001 standard.
- Periodic reporting to the Top Management on the performance of the EMS.

The EMSMR is supported and assisted by the following:

- A Cross Functional Team (CFT) appointed annually or as required, which updates the Fort A.P. Hill activities, products and services; reviews the Fort A.P. Hill significant aspects and provides input for Fort A.P. Hill's environmental objectives and targets.
- One or more multi-Directorate Management Program Teams, appointed annually or as required, to develop and coordinate the implementation of Management Programs for the accomplishment of Fort A.P. Hill's environmental objectives and targets.
- Internal EMS auditors who are selected from throughout the Installation, trained and who conduct Internal EMS Audits. The EMSMR maintains the roster of Fort A.P. Hill Internal EMS Auditors.

Fort A.P. Hill Directors implement the EMS within their Directorates, providing the needed management support and resources to do so. They coordinate with and provide appropriate assistance to the EMSMR for Installation-wide EMS requirements or initiatives. They participate with the Garrison Commander in periodic EMS management reviews, during EQCC meetings.

Procedures have been established and roles and responsibilities assigned for EMS planning activities (including the identification of environmental aspects and impacts, identification of legal and other requirements, and the establishment of objectives and targets, as well as the programs necessary to achieve those goals).

Operational control responsibilities include, but are not limited to, process and hazardous waste handling, implementing procedures, monitoring and measurement, document control, and training. Trained individuals in each activity manage environmental awareness and operational controls.

Any employee may identify problems and initiate action to isolate nonconformities related to a procedure, process, work instruction or any element of the EMS. Responsibility and authority for recording problems, initiating problem solutions and preventative actions, verifying solution implementation, and controlling nonconforming products until correction have been implemented are defined in the Preventative and Corrective Action Procedure.

Emergency response procedures are detailed in the Fort A.P. Hill Integrated Discharge Contingency Plan (IDCP). Site-specific emergency response plans are prepared and periodic familiarization training is provided to employees at the affected worksite.

The Garrison Commander conducts EMS Management Reviews at least annually. Management Review meetings include a review of the overall system, internal audit results and corrective action status, and other matters relevant to operation and effectiveness of the EMS.

Reporting & Record Keeping. Each facility should have an effective system of documenting the status of environmental management system operations and activities.

The EMS documentation provides a standardized structure for organizing Fort A.P. Hill policies, procedures, and work instructions, and records.

The Environmental Management Manual (Tier One) describes the core elements of the management system, including their interrelationships. The manual provides an overview of the EMS. It refers to, and cross-references, related documentation such as EMS procedures, Standard Operating Procedures and Environmental Management Programs.

Installation-wide (Tier Two) EMS Procedures detail specific EMS requirements and the roles, responsibilities and authorities to fulfill the requirements. As appropriate, Tier Two procedures reference related documentation such as Environmental Management Programs and Tier Three work instructions. Environmental compliance procedures are also referenced as appropriate in the Tier Two level of EMS documentation.

Directorate-level (Tier Three) work instructions or procedures for meeting EMS and related environmental requirements are documented and maintained within each Fort A.P. Hill directorate as appropriate.

Records (Tier Four) support and facilitate the implementation of the EMS. Records provide historical, objective evidence that activities have been performed and requirements have been met.

Training. Each facility should have procedures for ensuring that all employees have the necessary training relative to their roles in the facility's EMS.

One of the great benefits of implementing an EMS is that it educates and empowers employees so everyone (not just the Environmental Division) can find ways to improve environmental performance. Fort A.P. Hill has established and implemented training procedures which provide all staff members with appropriate levels of training which helps ensure their commitment towards a Sustainable Fort A.P. Hill and improve their competence in performing their roles and responsibilities. EMS training provides the initial introduction for personnel of the overall scheme for managing the installation's environmental issues as well as training in specific environmental media for identified personnel.

Emergency Response Procedures. Each facility should have effective procedures in place for responding to, reporting, mitigating and reviewing incidents. When reviewing each application, DEQ staff will look for:

- Evidence that the facility emergency management program is coordinated with local emergency response efforts.
- If an event were to take place, does the EMS have procedures in place to mitigate and reduce the likelihood of future events?

Proper preparedness for and responses to emergency situations minimize adverse environmental impacts in the event of an actual emergency. Fort A.P. Hill maintains emergency preparedness and response procedures to:

- Identify potential for accidents and emergency situations.
- Respond to accidents and emergency situations
- Prevent and mitigate the environmental impacts that may be associated with accidents and emergency situations.

The primary type of emergency with potential environmental impacts is a hazardous substance spill and/or release. Fort A.P. Hill follows the emergency response procedures for hazardous substance spills and releases that are detailed in the Fort A.P. Hill IDPCP.

The Fort A.P. Hill Fire Department is the first responder for hazardous spills and releases, and participates in emergency response exercises that are conducted periodically to exercise procedures in the IDPCP.

This document focuses on prevention and reporting aspects as well as mitigation in the event of an accidental discharge. It also provides for coordinated responses to any polluting discharges to which the Installation's Response Team (IRT), the Regional Response Team, or a contractor might be responding. To aid in this response, detailed information on emergency contacts and telephone numbers, initial response actions, spill response procedures, and spill reporting procedures for both immediate and written response are contained herein.

One of the major aspects of the IDPCP consists of procedures to control spills to minimize the impact on the navigable waters of the United States. This document also assists in minimizing the hazards to human health or the environment from a release of hazardous waste or hazardous waste constituents to the air, soil, or surface water. The IDPCP has been developed to provide a concise document that incorporates all the requirements of the various regulatory plans while eliminating redundancies and working within the existing EMS.

Monitoring, Investigative, and Corrective Actions for Noncompliance with EMS. The EMS should include provisions which address such events. When reviewing each application, DEQ staff will look for evidence that all such events are effectively addressed within the framework of the EMS and that the likelihood of "repeat offenses" has been significantly reduced or eliminated.

Fort A.P. Hill has established and maintains procedures to monitor and measure the key characteristics of its operations that can have a significant impact on the environment and/or the health and safety of its team members.

Monitoring and measurement is necessary to verify the exercise of operational control, to evaluate the Fort A.P. Hill performance in achieving its objectives and targets, and to provide input for management decisions. At the environmental management program level, milestones are developed to identify the monitoring and measurement for assessing achievement of Fort A.P. Hill sustainability objectives and targets. Examples of items monitored include reduction in hazardous and/or petroleum spills, reductions in pesticide/herbicide use, in air emissions, toxic substances releases, hazardous wastes generated, and inventories of hazardous materials. Procedures for reporting of information for monitoring purposes are contained in pertinent chapters or appendices of Fort A.P. Hill Regulation 200-1, and in various environmental management plans.

Fort A.P. Hill procedures for monitoring and measurement include the periodic evaluation of compliance with relevant environmental legislation, regulations and other requirements. A compliance inspection team in ED conducts periodic compliance inspections at the Installation-wide level. Every three years, Fort A.P. Hill undergoes an external environmental assessment (the Army's Environmental Performance Assessment System). In addition, local, state, and federal regulatory agencies make announced and unannounced inspections of Fort A.P. Hill. Results of all inspections and assessments and audits are used to generate management reports such as the Installation Status Report (ISR) for use by the ED and Garrison Top Management.

Continuous improvement of the EMS requires that non-conformances are identified and effectively corrected through the accurate identification of the root causes.

Procedures are maintained for identifying and handling non-conformances and other conditions requiring preventative and corrective action. These procedures include the response to environmental non-compliance findings or Notices of Violation (NOVs), which are reported through existing DA systems. These findings include those tracked through various processes, such as: the Environmental Performance Assessment System (EPAS), the Natural Infrastructure Section of the Installation Status Report (ISR), findings resulting from compliance inspections by regulatory agencies, and findings from internal environmental compliance inspections.

The preventative and corrective procedures define the responsibility and authority for:

- Investigation the non-conformance or condition,
- Taking action to mitigate any impact of the non-conformance or condition, and
- Initiating and completing corrective and preventative action.

Actual and potential non-conformances are identified in a number of ways, including team member observations, and internal and external (Third Party audits). The non-conformances are documented, assigned for identification of root cause and corrective action, and tracked by the EMSMR to final resolution. If the non-conformance is a Fort A.P. Hill-wide systemic problem, the EMSMR will coordinate with the CFT and/or the EQCC for resolution.

Corrective and preventative action resulting from the non-conformances may result in changes to the documented procedures. The EMSMR coordinates the recording and implementation of the changes.

The status of preventative and corrective actions is an agenda item for the EMS Management Review meetings.

Voluntary Self-Assessments. Each facility should have a system that provides for either external or internal EMS auditing. DEQ reviewers will be looking for an indication of each auditing system and any certifications that might result.

The EMS undergoes both external and internal audits. The audits provide the means for identifying opportunities to improve the effectiveness of the EMS.

A program and procedures are maintained for periodic internal EMS audits. These audits determine whether the EMS:

- Conforms to planned arrangements for environmental management,
- Conforms to the requirements of ISO 14001, and
- Has been properly implemented and maintained.

Internal audits are scheduled by the EMSMR in coordination with the Directors, based upon environmental importance of the activities audited, the work schedule of the Directorates, and the results of past audits.

The results of past audits are documented by the EMSMR and are an agenda item during EQCC. Non-conformances resulting from the audits are documented and tracked for corrective action as described in the Fort A.P. Hill Preventative and Corrective Action Procedure.

Internal auditors throughout Fort A.P. Hill have been trained. The EMSMR maintains a current list of trained auditors and schedules internal auditor training as needed to maintain an adequate number of auditors. The auditors are assigned as appropriate to accomplish these periodic internal audits.

Every three years, Fort A.P. Hill undergoes an external audit by the Army Environmental Center as a part of the Army's Environmental Performance Assessment System (EPAS). The Program Management portion of the EPAS is assessed according to the ISO 14001 standard. EPAS findings relevant to Fort A.P. Hill and the EMS are provided to the EMSMR for coordinating of preventative and/or corrective action as required.

Communicating With and Informing External and Internal Audiences. Each facility's EMS activities should be accessible to all employees and the general public. When reviewing applications, DEQ staff will be looking for:

- Easily accessible (e.g., web-based) EMS materials & communication
- Meetings with the public and staff regarding EMS/environmental efforts

External and Internal communications provide input for formulation as well as dissemination of information relevant to the EMS. Effective communications are essential for coordinating the execution of procedures and programs to fulfill the Environmental Policy and to achieve the objectives and targets. Procedures have been established for internal and external communications relevant to the EMS.

Internal communications procedures provide for up, down, and lateral flow within all Fort A.P. Hill organizations of essential information relevant to the EMS and other environmental items.

Procedures for external communications provide for managing information flow between Fort A.P. Hill and stakeholders located outside the fence line. Most communications concerning environmental matters with regulatory agencies and other outside agencies occur between the agency and DPW-ED. Official communications with higher headquarters is routed through the Director DPW and, where appropriate, the Garrison Commander. Inquiries from the media, public and other interested parties are forwarded to the Fort A.P. Hill Public Affairs Office (PAO) for response. The PAO coordinates with DPW-ED for response.

The Garrison Commander has determined that the following EMS information will be available to the public, upon request, through the PAO:

- The Fort A.P. Hill Environmental Policy
- Fort A.P. Hill Significant Aspects

E3 Environmental Compliance Requirements:

E2 facilities must also have a record of significant compliance with environmental laws and be in significant compliance with all applicable environmental requirements. The scope of this screen and the screening criteria will be consistent with the compliance requirements established by the 2005 Virginia legislation related to VEEP. See the VEEP website for more information.

E3 Environmental Results & Commitments:

Facilities are required to report annually on the results of their EMS and pollution prevention efforts (annual reports are due April 1st of each year). Establishing baseline data and tracking results is essential in order to evaluate the effectiveness of an EMS. A comprehensive EMS may address a wide array of environmental impacts including solid waste, water use, wastewater, energy usage, air impacts, etc.

The ability to measure and report progress is also critical to the administration and overall tracking of VEEP. Ideally, each participating facility will establish baselines and track progress on all of the environmental measures that are being addressed through their EMS. At a minimum, E3 facilities are required to commit to track EMS results in at least two of the following categories (a list of specific subcategories or "indicators" for each of the categories is available on the VEEP website):

 Solid waste	X	Solid waste recycling	X_	_ Hazardous waste
 Water use		Water discharges		Air emissions
 Energy use		Land preservation		Land restoration

In the annual report, facilities will be expected to provide a quantified baseline and results for the past year's efforts in each of these indicated categories. Facilities will also have the opportunity to provide reduction data in additional categories in the annual reporting process.